

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

| | | |
|--------------------------|---|--|
| UNITED STATES OF AMERICA |) | |
| |) | Criminal Case No. 21-cr-71-LM-01 |
| |) | |
| v. |) | Counts 1-3: Bank Fraud |
| |) | (18 U.S.C. § 1344) |
| |) | |
| ROBERT WILLIM, |) | Counts 4-5: False Representation of a Social |
| |) | Security Number |
| Defendant |) | (42 U.S.C. § 408(a)(7)(B)) |
| |) | |
| |) | Counts 6-7: Aggravated Identity Theft |
| |) | (18 U.S.C. § 1028A) |

INDICTMENT

The Grand Jury charges:

COUNTS ONE THROUGH THREE

Bank Fraud
18 U.S.C. § 1344

Background Information

At all times relevant to this Indictment:

1. Citizens Bank was a financial institution as defined by Title 18, United States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").
2. Citizens Bank had branch locations in multiple states, including New Hampshire, Rhode Island, and Vermont.

The Scheme and Artifice to Defraud

3. Beginning on an unknown date, but at least by on or about September 14, 2020, and continuing to September 18, 2020, in the District of New Hampshire and elsewhere, the defendant,

ROBERT WILLIM,

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud Citizens Bank. WILLIM entered Citizens Bank branch locations in New Hampshire and other states and presented means of identification and Social Security numbers belonging to Citizens Bank account holders and cashed or attempted to cash fraudulent checks addressed to those account holders.

4. Specifically, on or about the dates charted below, WILLIM executed and attempted to execute the scheme by cashing and attempting to cash fraudulent checks naming Citizen's Bank customers as payees by entering the Citizens Bank branch offices listed below, and impersonating the account holders by presenting personal identifying information of the account holder, including their name, Social Security number, and often a counterfeit Passport card that contained the account holder's personal identifying information and WILLIM's photograph.

| Count | Date | Location | Victim | Transaction | Amount |
|-------|----------|----------------|--------|-----------------------|------------|
| 1 | 09/14/20 | Keene, NH | A.W. | Check cashed | \$3,952.00 |
| 2 | 09/15/20 | Concord, NH | A.W. | Check cashed | \$2,068.20 |
| 3 | 09/15/20 | Manchester, NH | I.G. | Attempt to cash check | \$3,952.00 |

All in violation of Title 18, United States Code, Section 1344.

COUNTS FOUR AND FIVE

False Representation of a Social Security Number
42 U.S.C. § 408(a)(7)(B)

5. The Grand Jury realleges paragraphs 1 through 4.

6. On or about the dates charted below, in the District of New Hampshire and elsewhere, the defendant,

ROBERT WILLIM,

for the purpose of obtaining for himself and any other person anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent numbers to be the Social Security number assigned by the Commissioner of Social Security to him. Specifically, WILLIM attempted to cash fraudulent checks at Citizens Bank with Social Security numbers on the reverse side when, in fact, such numbers were not the Social Security number assigned by the Commissioner of Social Security to him.

| Count | Date | Location | Victim |
|-------|----------|----------------|--------|
| 4 | 09/15/20 | Concord, NH | A.W. |
| 5 | 09/15/20 | Manchester, NH | I.G. |

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNTS SIX AND SEVEN

Aggravated Identity Theft

18 U.S.C. § 1028A

7. The Grand Jury realleges paragraphs 1 through 4.

8. On or about the date charted below, in the District of New Hampshire and elsewhere, the defendant,

ROBERT WILLIM,

during and in relation to the felony violation of bank fraud in violation of Title 18, United States Code, Section 1344, knowingly possessed and used, without lawful authority, means of identification—namely, the name, date of birth, and Social Security number—of another person.

| Count | Date | Location | Victim |
|-------|----------|----------------|--------|
| 6 | 09/15/20 | Concord, NH | A.W. |
| 7 | 09/15/20 | Manchester, NH | I.G. |

All in violation of Title 18, United States Code, Section 1028A.

NOTICE OF FORFEITURE

The allegations in Counts One through Three, Six, and Seven are realleged for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(2). Upon conviction, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(2) any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

All in accordance to 18 U.S.C. § 982(a)(2) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

Dated: April 19, 2021

/s/ Foreperson
FOREPERSON

JOHN J. FARLEY
ACTING UNITED STATES ATTORNEY

By: /s/ Alexander S. Chen
Alexander S. Chen
Special Assistant U.S. Attorney

/s/ Matthew T. Hunter
Matthew T. Hunter
Assistant U.S. Attorney